

# EXHIBIT 11

# FILED UNDER SEAL

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

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NETLIST, INC., )  
Plaintiff. )  
vs. ) Case No.  
MICRON TECHNOLOGY, INC.; ) 2:22-cv-203-JRG-RSP  
MICRON SEMICONDUCTOR )  
PRODUCTS, INC.; MICRON )  
TECHNOLOGY TEXAS LLC, )  
Defendants. )  
\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF HAROLD STONE, Ph.D.

REMOTE PROCEEDINGS

MONDAY, JUNE 26, 2023

STENOGRAPHICALLY REPORTED BY:

ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~ CSR

LICENSE NO. 9830

JOB NO. 5968770

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1	A P P E A R A N C E S:	1	E X H I B I T S
2		2	EXHIBIT PAGE
3		3	Exhibit 6 Lattice XP2 Family Data Sheet 32
4	FOR PLAINTIFF:	4	Introduction
5	IRELL & MANELLA LLP	5	Exhibit 7 Petition for Inter Partes Review 44
6	BY: MICHAEL TEZIAN, Esq.	6	of Patent No. 9,606,907
7	HONG (ANNITA) ZHONG, Esq.	7	Exhibit 8 Microcomputer Interfacing 71
8	1800 Avenue of the Stars, Suite 900	8	Exhibit 9 U.S. Patent 8,787,050 Lee 84
9	Los Angeles, California 90067	9	Exhibit 10 Exhibit 10 A 1.2V 65Gb 341GB/s 89
10	310.277.1010	10	HBM2 Stacked DRAM with Spiral
11	mtezyan@irell.com	11	Point-to-Point TSV Structure and
12		12	Improved Bank Group Data Control
13	FOR DEFENDANT:	13	Exhibit 11 U.S. Patent Application 121
14	WINSTON & STRAWN LLP	14	2011/0103156 Kim, et al.
15	BY: MICHAEL R. RUECKHEIM, Esq.	15	Exhibit 12 U.S. Patent Application 128
16	JUAN C. YAQUIAN, Esq.	16	2011/0026293 Riho
17	255 Shoreline Drive, Suite 520	17	Exhibit 13 U.S. Patent 7,969,192 Wyman, 150
18	Redwood City, California 94065	18	et al.
19	650.858.6433	19	Exhibit 14 Frequently Asked Questions 157
20	mrueckheim@winston.com	20	Exhibit 15 Synchronous DRAM Architectures, 159
21		21	Organizations, and Alternative
22	ALSO PRESENT: Anthony Gulino, Videographer	22	Technologies
23	Lance Hoeppner, Technician	23	Exhibit 16 U.S. Patent 10,949,339 Lee 190
24	---oOo---	24	---oOo---
25		25	REMOTE PROCEEDINGS
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1	I N D E X	1	June 26, 2023 9:34 A.M.
2		2	---oOo--- 09:02
3	WITNESS: Harold Stone, Ph.D.	3	09:34
4		4	THE VIDEOGRAPHER: Good morning, everyone. 09:34
5		5	We are going on the record at 9:34 a.m. Pacific 09:34
6	EXAMINATION PAGE	6	Daylight Time on June 26, 2023. 09:34
7	BY MR. TEZIAN 7, 186	7	Please note that this deposition is being 09:34
8	BY MR. RUECKHEIM 185	8	conducted virtually. Quality of recording depends on 09:34
9		9	the quality of camera and Internet connection of 09:34
10	---oOo---	10	participants. What is seen from the witness and heard 09:34
11	E X H I B I T S	11	on screen is what will be recorded. 09:34
12	EXHIBIT PAGE	12	Audio and video recording will continue to 09:34
13	Exhibit 1 Declaration of Harold S. Stone, 10	13	take place unless all parties agree to go off the 09:34
14	Ph.D. in Support of Defendants'	14	record. 09:34
15	Claim Construction Positions	15	This is Media Unit 1 of the video-recorded 09:34
16		16	deposition of Dr. Harold Stone, taken by counsel for 09:34
17	Exhibit 2 Power Electronics Converters, 16	17	Plaintiff. 09:34
18	Applications, and Design	18	In the matter of Netlist, Inc. versus Micron 09:34
19	Exhibit 3 Understanding Low Drop Out (LDO) 21	19	Technology, Inc., et al. Filed in the United States 09:35
20	Regulators	20	District Court for the Eastern District of Texas, 09:35
21	Exhibit 4 U.S. Patent 11,016,918 Chen, 26	21	Marshall Division. The case number is 2:22-CV-203 JRG 09:35
22	et al.	22	RSP. 09:35
23	Exhibit 5 JDEC Standard No. 21-C DDR SDRAM 27	23	This deposition is being conducted remotely 09:35
24	Registered DIMM Design Specification	24	using virtual technology. 09:35
25	///	25	My name is Anthony Gulino, representing 09:35
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<p>1 you what's happening. Look at Figure 2.20, page 79. 13:39</p> <p>2 Okay. On this page, a wave is sent from the left 13:39</p> <p>3 where there -- you see the Z0, and it goes out to 13:39</p> <p>4 where there's a junction. At the junction, it's 13:39</p> <p>5 reflected back, and part of the wave goes forward 13:39</p> <p>6 straight; part of it goes to the left. That's what 13:40</p> <p>7 you're dealing with with physics. 13:40</p> <p>8 And that happens when you're connected to the 13:40</p> <p>9 die, regardless of what happens on the die, whether 13:40</p> <p>10 there is a port array connected to it or not. 13:40</p> <p>11 So what happens is that the wave propagates 13:40</p> <p>12 on the die along the stub or to the port array, and it 13:40</p> <p>13 bounces back again. So those waves are going back and 13:40</p> <p>14 forth and back and forth, and that's what causes the 13:40</p> <p>15 noise that you saw in the earlier figure. 13:40</p> <p>16 Let me go back to 2.19. Do you see that 13:40</p> <p>17 noise there? Each bump or change is a result of a 13:40</p> <p>18 reflection, and the reflections come from the port 13:40</p> <p>19 arrays, the data arrays on the ports. They also come 13:40</p> <p>20 from the stubs if they don't have a data port 13:40</p> <p>21 connected, and they come from the points where there's 13:40</p> <p>22 a branch. 13:41</p> <p>23 So changing things by removing or adding 13:41</p> <p>24 devices only changes the noise, unless you don't have 13:41</p> <p>25 a multi -- unless there are no stubs or no drivers. 13:41</p> <p style="text-align: right;">Page 94</p>	<p>1 the die interconnects in" -- "communication with the 13:43</p> <p>2 respective drivers." 13:44</p> <p>3 Okay. Now, let's see. There may be 13:44</p> <p>4 additional I would like to look at. Now, continuing 13:44</p> <p>5 on from that point, it says: 13:44</p> <p>6 "In some embodiments, forming the electrical 13:44</p> <p>7 connections can comprise forming electrical 13:44</p> <p>8 connections between the die interconnects and a data 13:44</p> <p>9 conduit." 13:44</p> <p>10 Okay. 13:44</p> <p>11 Q I'm sorry to interrupt, but can I ask a 13:44</p> <p>12 clarifying question? 13:44</p> <p>13 A And see, that -- that -- well, actually, 13:44</p> <p>14 that's not so relevant. It's the previous sentence 13:44</p> <p>15 that I read: 13:44</p> <p>16 "Forming the electrical connections places 13:44</p> <p>17 the die interconnects in electrical communication with 13:44</p> <p>18 the respective drivers." 13:44</p> <p>19 So what we've done is we -- if you connect a 13:44</p> <p>20 die interconnect to a -- one of the levels in the 13:45</p> <p>21 figure, you now are connecting to some conductor. 13:45</p> <p>22 That conductor will carry a wave when you -- when you 13:45</p> <p>23 drive it. It has capacitance. It has a load. 13:45</p> <p>24 And whether or not that conductor is -- is 13:45</p> <p>25 attached to a data port, you will see the wave go down 13:45</p> <p style="text-align: right;">Page 96</p>
<p>1 Then you -- then you can get a predictable wave. And 13:41</p> <p>2 that has -- that even has reflections, but it looks 13:41</p> <p>3 different. 13:41</p> <p>4 So that's my testimony. 13:41</p> <p>5 Q Okay. Let me see if I understand something. 13:41</p> <p>6 Is it your testimony that the connection 13:41</p> <p>7 between a TSV and a stub is electrical communication? 13:41</p> <p>8 A Yeah. This demonstrates it, because the wave 13:41</p> <p>9 travels on that. 13:41</p> <p>10 Q Okay. What does the word "electrical 13:41</p> <p>11 communication" mean to you? 13:41</p> <p>12 A Electrical connection. That's -- I got that 13:41</p> <p>13 from the patent. I can show you where he says that. 13:41</p> <p>14 Q Okay. Show me. 13:41</p> <p>15 A Okay. The patent -- the -- is what exhibit? 13:41</p> <p>16 Q Exhibit 9, sir. 13:42</p> <p>17 A Okay. I'll open the Exhibit 9. 13:42</p> <p>18 So I have the '060 patent up. I'll -- I will 13:42</p> <p>19 find that reference that says that it connects -- 13:42</p> <p>20 makes the association between electrical communication 13:43</p> <p>21 and electrical connection. 13:43</p> <p>22 I would like you to look at column 17. 13:43</p> <p>23 Q Okay. I'm there. 13:43</p> <p>24 A I'm looking at line 65. Line 65 reads: 13:43</p> <p>25 "Forming the electrical connections places 13:43</p> <p style="text-align: right;">Page 95</p>	<p>1 that conductor. At the end, it will bounce -- bounce 13:45</p> <p>2 back, and you'll see that as noise. Moreover, the 13:45</p> <p>3 capacitance on the conductor will load the driver. 13:45</p> <p>4 So in every way, forming the electrical 13:45</p> <p>5 connection and placing this piece of a -- of a metal 13:45</p> <p>6 on the -- on an array, it will form to an electrical 13:45</p> <p>7 communication. That's what you'll get. Electrical 13:45</p> <p>8 connection is electrical communication in this sense. 13:45</p> <p>9 Q Okay. But can I ask a clarifying question? 13:46</p> <p>10 So on line 65, column 17, it says: 13:46</p> <p>11 "Forming the electrical connection places the 13:46</p> <p>12 die interconnects in electrical communication with the 13:46</p> <p>13 respective drivers." 13:46</p> <p>14 Right? 13:46</p> <p>15 That's talking about the drivers on the 13:46</p> <p>16 control die; right? 13:46</p> <p>17 A That's correct. 13:46</p> <p>18 Q Okay. So it's not talking about electrical 13:46</p> <p>19 communication with the array dies; right? 13:46</p> <p>20 A No. I disagree. 13:46</p> <p>21 Q Why? 13:46</p> <p>22 A You -- you will understand that the VIA is 13:46</p> <p>23 now connected to the -- to the array die, because 13:46</p> <p>24 there may be metal there. There may be a metal -- a 13:46</p> <p>25 metal pathway. 13:46</p> <p style="text-align: right;">Page 97</p>